

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	X
ANDAV CAPITAL, NISHA DESAI,	:
	:
Plaintiffs,	:
	Case No. 1:25-cv-00033-JMF
vs.	:
	:
PAYPAL HOLDINGS, INC., PAYPAL	:
VENTURES,	:
	:
Defendants.	:
	X

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**NOTICE OF DEFENDANTS' MOTION TO DISMISS**  
**PLAINTIFFS' COMPLAINT**

PLEASE TAKE NOTICE that Defendants PayPal Holdings, Inc. and PayPal Ventures (collectively, the “Defendants”), pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), move this Court for an order dismissing the claims against them with prejudice for lack of standing, or for failure to state a claim under Section 1981, Title VI of the Civil Rights Act of 1964, the New York State Human Rights Law (“NYSHRL”), or the New York City Human Rights Law (“NYCHRL”), among other reasons. In support of their Motion, Defendants will rely upon Defendants’ Memorandum of Law in Support of their Motion to Dismiss Plaintiffs’ Complaint, dated April 16, 2025, and on the prior pleadings and proceedings in this case.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request that oral argument on this motion be held on a date and at a time designated by the Court.

Dated: April 16, 2025

Respectfully submitted,

By: /s/ Mylan L. Denerstein

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